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9

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 MICHAEL HILL,

13 Plaintiff,

14 vs.

15 WELLS FARGO BANK, N.A., a foreign  
16 corporation; U.S. BANK NATIONAL  
ASSOCIATION, a foreign corporation; MTC  
17 FINANCIAL, INC. dba TRUSTEE CORPS, a  
foreign corporation; and DOES I through 10,  
18 and ROE CORPORATIONS 1 through 10,

19 Defendants.  
20

CASE NO.: 2:18-cv-01350-MMD-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE  
OPPOSITION TO PARTIAL MOTION  
TO DISMISS AMENDED  
COMPLAINT AND REPLY IN  
SUPPORT OF PARTIAL MOTION TO  
DISMISS AMENDED COMPLAINT**

**(SECOND REQUEST)**

21 Plaintiff Michael Hill ("Plaintiff"), by and through his undersigned counsel of record, the  
22 law firm of Bowen Law Offices, and Defendants Wells Fargo Bank, N.A. and U.S. Bank National  
23 Association (collectively "Defendants"), by and through their undersigned counsel of record, the  
24 law firm of Snell & Wilmer L.L.P., hereby stipulate and request an order from the Court to extend  
25 the filing deadline for Plaintiff's opposition to Defendants' Partial Motion to Dismiss Amended  
26 Complaint filed on March 8, 2019 (ECF No. 57) and Defendants' reply in support of the same  
27 Motion. This is the second stipulation for an extension of time regarding Defendants' Partial  
28 Motion to Dismiss.

1 Currently, Plaintiff's opposition to Defendants' Partial Motion to Dismiss is due no later  
2 than March 29, 2019 (ECF No. 59). Plaintiff and Defendants request a one (1) day extension of  
3 time, up to and including, April 1, 2019, for Plaintiff to file his opposition. Plaintiff requires  
4 additional time to complete his research to support his opposition.

5 Defendants' reply in support of their Partial Motion to Dismiss is due April 19, 2019.  
6 Plaintiff and Defendants also request a one (1) day extension of time, up to and including, April  
7 22, 2019, for Defendants to file their reply. Defendants also anticipate needing additional time to  
8 complete research and client review of the reply.

9 IT IS STIPULATED AND AGREED by and between Plaintiff and Defendants that  
10 Plaintiff shall have up to and including April 1, 2019, to file his opposition to Defendants' Partial  
11 Motion to Dismiss and Defendants shall have up to and including April 22, 2019, to file their  
12 reply in support of Defendants' Partial Motion to Dismiss (ECF No. 57).

13  
14 DATED this 29<sup>th</sup> day of March, 2019

DATED this 29<sup>th</sup> day of March, 2019

15 By: /s/ Brandon J. Trout

16 Jerome R. Bowen, Esq.  
17 Nevada Bar No. 4540  
18 Brandon J. Trout, Esq.  
19 Nevada Bar. No. 13411  
20 Bowen Law Offices  
21 9960 W. Cheyenne Ave., Suite 250  
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25 *Attorneys for Plaintiff*

By: /s/ Holly E. Cheong

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*Attorneys for Wells Fargo Bank, N.A.*

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**IT IS SO ORDERED.**



DISTRICT COURT JUDGE

DATED: April 1, 2019

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen  
3 (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be  
4 served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND**  
5 **TIME TO FILE OPPOSITION TO PARTIAL MOTION TO DISMISS AMENDED**  
6 **COMPLAINT AND REPLY IN SUPPORT OF PARTIAL MOTION TO DISMISS**  
7 **AMENDED COMPLAINT** by the method indicated:

8 \_\_\_\_\_ U.S. Mail  
9 \_\_\_\_\_ U.S. Certified Mail  
10 \_\_\_\_\_ Facsimile Transmission  
11 \_\_\_\_\_ Overnight Mail  
12 \_\_\_\_\_ Federal Express  
13 \_\_\_\_\_ Hand Delivery  
14       X       Electronic Filing

15  
16 and addressed to the following:

17 Jerome R. Bowen, Esq.  
18 Brandon J. Trout, Esq.  
19 Bowen Law Offices  
20 9960 W. Cheyenne Ave., Suite 250  
21 Las Vegas, NV 89129  
22 *Attorneys for Plaintiff Michael Hill*

23 Dated: March 29, 2019

24 /s/ Maricris Williams  
25 An Employee of Snell & Wilmer L.L.P.

26  
27 4845-4794-7920  
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